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Subject:	RD 3A FSP-Surface Water Sampling
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Chip & Eric,
Earlier today, Jennifer P submitted her comments on the LWG's 9/18/06 "*RD 3A FSP-Surface Water Sampling*". Here are a couple additional comments from me. Jennifer & I will be the only 2 DEQ staff commenting on this FSP.

1) "Background", Section 2.1.3, page 7- In the referenced text, the LWG states that surface water data at upstream locations are needed to establish "background" conditions. The upstream surface water samples will help evaluate surface water coming into the Study Area from upstream, but not necessarily background. The LWG should distinguish between "background" (in this case, ambient, system-wide contaminant levels) & elevated contaminant concentrations outside of the Study Area.

2) Outfalls extending into the river, Section 2.1.5, page 7- In certain sampling locations, the LWG will collect near-bottom water samples & water samples collected higher in the water column. The FSP states "*Information on near-bottom versus higher water column surface water concentrations will help (along with sediment trap data) determine the extent to which surface water concentrations originate from external sources (e.g., stormwater) and/or flux from contaminated sediment into the water column (e.g., resuspension, molecular diffusion, bioturbation)*". Apparently the FSP assumes all stormwater outfalls discharge into the upper portion of the water column. This is not necessary true. A number of stormwater outfalls extend some distance into the river from the shore & discharge near the river bottom. The LWG should be cautious assuming upper water column samples reflect external sources more than near-bottom samples.

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